



**DEPARTMENT OF FORESTRY AND FIRE PROTECTION
OFFICE OF THE STATE FIRE MARSHAL
RUBEN GRIJALVA, STATE FIRE MARSHAL**

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March 29, 2005

**Re: NFPA 25 Inspection, Testing and Maintenance of
Water-Based Fire Protection Systems**

After careful deliberation and several years of research, the Office of the State Fire Marshal has determined that it is in the public's best interest to submit National Fire Protection Association (NFPA) Standard 25, to the Office of Administrative Law for adoption. NFPA 25 is the Standard for the Inspection, Testing and Maintenance of Water-Based Fire Protection Systems and is a companion document for numerous NFPA standards on water-based systems.

This standard would be adopted and amended through Title 19, California Code of Regulation (CCR). Title 19, CCR, which now contains the standards for inspection, testing and maintenance for water-based fire protection systems, has become obsolete due to new technological advances.

The main objective in deciding if adoption of NFPA 25 was warranted was to provide adequate servicing for modern fire suppression systems. To insure that all fire service and building owner concerns were addressed, this Standard was amended for three main reasons:

- Inspection, Testing, and Maintenance Frequency Changes. For a variety of factors, including consistency, complexity of systems and economic reasons, the SFM Advisory Committee and SFM staff felt that it would be too onerous to maintain the large assortment of required inspection frequencies; i.e., (daily, weekly, monthly, bi-monthly, quarterly, semiannual, annually, bi-annually and five-year).
- NFPA 25 does not address older standpipe system testing pressures. There are numerous jurisdictions that have older standpipes systems that cannot be tested at the new higher test pressures so older testing standards were added.
- Because some California requirements provide additional protection to NFPA 25, we will continue to enforce these requirements

Page 2
March 29, 2005

Please review the following two documents for changes to Title 19 CCR and amendments to NFPA 25, 2002 edition. These documents can be found at the OSFM website at <http://osfm.fire.ca.gov> Please provide comments to Randy Roxson, Division Chief, Code Development, at randy.roxson@fire.ca.gov or 916-445-8200. Thank you for your interest in this proposed regulation change.

Sincerely,

A handwritten signature in black ink, appearing to read "R. Grijalva", written over the printed name.

RUBEN GRIJALVA
State Fire Marshal